A *prima facie* case of anticipation under 35 U.S.C. § 102 requires a showing that each limitation of a claim is found in a single reference, practice or device. *In re Donohue*, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

Claims 1, 12, 18, and the Claims Depending Therefrom

The Examiner rejected claims 1-23 under 35 U.S.C. § 102(a) as being anticipated by Puri (U.S. Pat. No. 5,563,593). Applicants respectfully traverse this rejection because the Puri reference fails to support the Examiner's rejection. While the Puri reference does disclose an encoder used in video coding, the reference does not disclose all of the claimed elements, such as "applying at least first and second compression mapping tables from the plurality of compression mapping tables to subregions of an uncompressed image data stream to compress the subregions." Claims 1, 12, and 18 each recite this subject matter, which is clearly missing from the cited reference.

The Examiner asserted that the Discrete Cosine Transform (DCT) events manipulated by Puri are equivalent to an uncompressed image data stream. In fact, the Examiner admitted that the Puri reference teaches that variable length encode tables are applied to *DCT events* to compress/encode using encoder 915. Clearly, the Puri reference describes encoding DCT events, not *an uncompressed data stream* as recited in the claims. In the Puri reference, DCT events are described as the output of a transform encoder, which outputs quantized and scanned transform coefficients. Col. 3, lines 4-6 and lines 39-46. The DCT events are not an *uncompressed image data stream* because these DCT events are actually encoded coefficients. Thus, in view of the description in the Puri reference, the encoder 915 cannot apply *a first and second compression mapping tables to subregions of an uncompressed image data stream*, as recited in the claims. Accordingly, the Puri reference does not disclose the element of "applying at least first and second compression mapping tables from the

plurality of compression mapping tables to subregions of an uncompressed image data stream to compress the subregions."

Because the Examiner has misconstrued the Puri reference and the cited reference fails to disclose *all* of the claimed elements, the Examiner has failed to establish that the Puri reference anticipates the claimed subject matter. Therefore, independent claims 1, 12, and 18 and their respective dependent claims are believed to be patentable over the Puri reference.

Claims 24 and the Claims Depending Therefrom

The Examiner rejected claims 24-27 under 35 U.S.C. § 102(e) as being anticipated by Hirabayashi et al. (U.S. Pat. No. 6,101,282). Applicants respectfully traverse this rejection because the Hirabayashi et al. reference fails to support the Examiner's rejection. Clearly, the Hirabayashi et al. reference does not disclose all of the claimed elements, such as "compressing subregions of the image data stream by application of a plurality of compression code tables." Claim 24 recites this claimed subject matter, which is clearly missing from the cited reference.

With regard to the missing element of "compressing subregions of the image data stream by application of a plurality of compression code tables," the Examiner has misapplied the Hirabayashi et al. reference to the recited claim. The Examiner asserted that the encoder 104 taught by Hirabayashi et al. is equivalent to "compressing subregions of the image data stream by application of a plurality of compression code tables." However, the encoder 104 in the Hirabayashi et al. reference does not compress the image data stream with *a plurality of compression code tables*, but uses a single Huffman code table. Col. 9, lines 56-59. Indeed, as a means of altering the video coding, the difference value circuits 102 and 103 provide two different data streams, which are encoded by the same Huffman table that is used for the entire image stream. Col. 10, lines 23-29. Clearly, the Examiner's rejection is unsupported because the reference